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May 20, 2022

VIA ECF

Honorable Maryellen Noreika
J. Caleb Boggs Federal Building
844 N. King Street
Unit 19
Room 4324
Wilmington, DE 19801-3555

Re: *In re Decade, S.A.C., LLC, et al.*, Civil Case No. 22-00291 (MN)

Your Honor:

We are general bankruptcy counsel to David W. Carickhoff, the chapter 7 trustee (the “Trustee”). Together with counsel for Aaron Goodwin and Eric Goodwin and counsel for XXIII Capital Ltd. (collectively with the Trustee, the “Parties”), we write in response to Your Honor’s oral ruling on May 19, 2022 [D.I. 18]. The Trustee believes that any ruling on the Joint Motion for Stay Pending Appeal [D.I. 13-17] should be deferred until the conclusion of mediation. Counsel to the other Parties have confirmed that they likewise have no objection to deferral.

By way of brief update, mediation is currently scheduled to be held on June 16, 2022. The Honorable Craig T. Goldblatt of the United States Bankruptcy Court for the District of Delaware has agreed to act as mediator, as Judge Brendan L. Shannon had a scheduling conflict and was unable to serve in such capacity.

The Parties remain available if Your Honor has any questions or would like to address this matter further.

Respectfully submitted,

/s/ Alan M. Root
ALAN M. ROOT

cc: All counsel of record via ECF
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